

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
)	
LOIS BUSINESS DEVELOPMENT CORPORATION, ¹)	Case No. 22-90267 (MI)
)	
Reorganized Debtor.)	(Formerly Jointly Administered Under Lead Case Cineworld Group plc, Case No. 22-90168)
)	
)	Re: Docket No. 114

**CERTIFICATE OF COUNSEL WITH RESPECT TO REORGANIZED DEBTOR'S
THIRD OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM (CROSS-
DEBTOR DUPLICATE CLAIMS)**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas* (the “Complex Procedures”), the undersigned counsel for the above-captioned reorganized debtor (the “Reorganized Debtor”) certifies as follows:

1. On November 28, 2023, the Reorganized Debtor filed the *Reorganized Debtor's Third Omnibus Objection to Certain Proofs of Claim (Cross-Debtor Duplicate Claims)* [Docket No. 114] (the “Claim Objection”). The Claim Objection was served on November 28, 2023. *See Affidavit of Service* [Docket No. 124].

2. The deadline for parties to file objections and responses to the Claim Objection was December 28, 2023 (the “Objection Deadline”). No objections or responses to the Claim Objection were filed on the docket on or before the Objection Deadline. Counsel to the Reorganized Debtor received an informal response from The Metropolitan Opera. As a result of the discussions with counsel to The Metropolitan Opera, the Reorganized Debtor filed its *Notice*

¹ The location of Reorganized Debtor Lois Business Development Corporation's principal place of business and the Reorganized Debtor's service address in this chapter 11 case is: 101 E. Blount Avenue, Knoxville, TN 37920-1605. All pleadings related to these chapter 11 cases may be obtained from the website of the Reorganized Debtor's claims and noticing agent at <https://cases.ra.kroll.com/cineworld>.

of Partial Withdrawal of the Reorganized Debtor's Third Omnibus Objection Solely with Respect to the Proofs of Claim filed by The Metropolitan Opera [Docket No. 143]. The revised proposed order attached hereto removes the claims of The Metropolitan Opera.

3. On December 5, 2023, Dense Enterprises, LLC d/b/a Dense Mechanical withdrew Proof of Claim Nos. 2132 and 2155, which were included in the Claim Objection, through a "Claim Withdrawal Form" sent to the Reorganized Debtor's claims, noticing and solicitation agent, Kroll Restructuring Administration LLC ("Kroll"). The revised proposed order attached hereto removes the claims of Dense Enterprises, LLC d/b/a Dense Mechanical.

4. The undersigned counsel certifies that the attached revised proposed order resolves all known objections and responses received. A redline reflecting the changes between the revised order and the original order filed with the Claim Objection is attached hereto.

5. The Reorganized Debtor requests that the Court enter the attached proposed order at its earliest convenience.

Houston, Texas
January 4, 2024

/s/ Vienna F. Anaya

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Co-Counsel to the Reorganized Debtor

Certificate of Service

I certify that, on January 4, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Vienna F. Anaya
Vienna F. Anaya